

1 Nicholas A. Brown (CA SBN 198210)
brownnn@gtlaw.com
2 Vera Ranieri (Bar No. 271594)
ranieriv@gtlaw.com
3 GREENBERG TRAURIG LLP
4 Embarcadero Center
Suite 3000
5 San Francisco, CA 94111
Telephone: 415.655.1300
Facsimile: 415.707.2010

Kenneth B. Wilson (CA SBN 130009)
ken@coastsidelegal.com
COASTSIDE LEGAL
455 1st Avenue
Half Moon Bay, CA 94019
Telephone: 650.440.4211
Facsimile: 650.440.4851
Attorneys for Defendant Oliso, Inc.

6 Kevin J. O'Shea (*pro hac vice*)
7 GREENBERG TRAURIG, LLP
77 West Wacker Drive
8 Chicago, IL 60601
Telephone: (312) 456-8400
9 Facsimile: (312) 456-8435

10 Attorneys for Plaintiff
Sunbeam Products, Inc. d/b/a Jarden Consumer
11 Solutions

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 SUNBEAM PRODUCTS, INC. d/b/a JARDEN
18 CONSUMER SOLUTIONS,

CASE NO. 3:13-cv-03577-SI

19 Plaintiff,

**JOINT STIPULATION TO EXTEND
THE DEADLINE FOR MEDIATION**

20 v.

21 OLISO INC.,

22 Defendant.

23
24
25
26
27
28 CASE NO.: 3:13-cv-03577-SI

JOINT STIPULATION TO EXTEND THE DEADLINE FOR MEDIATION

Pursuant to ADR L.R. 6-5(a), and Civil L.R. 6-2 and 7-1(a)(2), Plaintiff Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions (“Plaintiff”) and Defendant Oliso, Inc. (“Defendant”) hereby jointly request that the Court extend the mediation deadline from February 18, 2014 to April 30, 2014. In support of this request, the parties state the following:

1. The Court appointed Benjamin Riley as the mediator for this case on December 30, 2013. (Dkt. No. 35.) Mr. Riley informed the parties’ counsel that the ADR Unit has set a mediation deadline of February 18, 2014.

2. The parties’ counsel and Mr. Riley conducted a pre-mediation telephone conference, pursuant to ADR L.R. 6-6, on January 16, 2014. During that call, counsel and Mr. Riley agreed that the parties would request an extension of the mediation deadline to April 30, 2014, so that the mediation would take place after the Court ruled on Defendant’s then-pending summary judgment motion. Later that day, the Court issued its ruling denying Defendant’s summary judgment motion. (Dkt. No. 40.)

3. Soon thereafter, Plaintiff identified what it believes to be a conflict of interest involving Defendant’s counsel. The parties have exchanged their positions regarding this issue, and Plaintiff intends to file a Motion to Disqualify Defendant’s counsel within the next seven days.

4. The parties agree that the mediation should occur after the Court has ruled on Plaintiff’s forthcoming Motion to Disqualify. The parties’ counsel have discussed this issue with Mr. Riley, the mediator, and he concurs with this position. Pursuant to ADR L.R. 6-5(a), this Stipulation is being served on Mr. Riley. Mr. Riley has indicated that he will apprise the ADR Unit regarding this Stipulation.

5. The only previous time modification in this case was the parties’ request that the Court reschedule the initial Case Management Conference from November 8, 2013 to November 22, 2013, which the Court granted. (Dkt. No. 21.)

6. No Scheduling Order has been entered in this case. The next Case Management Conference is scheduled for March 7, 2014. (Dkt. No. 30.)

7. Accordingly, the parties jointly request that the Court extend the mediation deadline from February 18, 2014 to April 30, 2014.

Dated: January 24, 2014

By: /s/ Kevin J. O'Shea

Nicholas A. Brown (CA SBN 198210)
brownnn@gtlaw.com
Vera Ranieri (Bar No. 271594)
ranieriv@gtlaw.com
GREENBERG TRAURIG LLP
4 Embarcadero Center
Suite 3000
San Francisco, CA 94111
Telephone: 415.655.1300
Facsimile: 415.707.2010

Kevin J. O'Shea (*pro hac vice*)
GREENBERG TRAURIG, LLP
77 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 456-8400
Facsimile: (312) 456-8435

Attorneys for Plaintiff
Sunbeam Products, Inc. d/b/a Jarden Consumer
Solutions

By: /s/ Kenneth B. Wilson (with permission)

Kenneth B. Wilson (CA SBN 130009)
ken@coastsidetech.com
COASTSIDE LEGAL
455 1st Avenue
Half Moon Bay, CA 94019
Telephone: 650.440.4211
Facsimile: 650.440.4851

Attorneys for Defendant
Oliso, Inc.

PURSUANT TO STIPULATION,
IT IS SO ORDERED

1/24/14

Date



Hon. Susan Illston